

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
- against -	:
	:
RIPPLE LABS, INC., BRADLEY GARLINGHOUSE,	:
and CHRISTIAN A. LARSEN,	:
	:
Defendants.	:
	:
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DECLARATION OF JORGE G. TENREIRO

I, Jorge G. Tenreiro, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the Bar of the State of New York.
2. I am employed as Senior Trial Counsel in the New York Regional Office of Plaintiff Securities and Exchange Commission (the “SEC”). I submit this declaration in support of the SEC’s Memorandum of Law in Opposition to Defendants Christian A. Larsen’s and Bradley Garlinghouse’s Motions to Dismiss.
3. Attached hereto as **Exhibit A** is a true and correct copy of the Order Instituting Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933, Making Findings, and Imposing a Cease-and-Desist Order in *In the Matter of Prosper Marketplace, Inc.*, Release No. 33-8984 (Nov. 24, 2008), publicly available at <https://www.sec.gov/litigation/admin/2008/33-8984.pdf>.
4. Attached hereto as **Exhibit B** is a true and correct copy of a February 8, 2012 legal memorandum.
5. Attached hereto as **Exhibit C** is a true and correct copy of an October 19, 2012 legal memorandum.

6. Attached hereto as **Exhibit D** is a true and correct copy of guidance issued on March 18, 2013 entitled *Application of FinCEN's Regulations to Persons Administering, Exchanging, or Using Virtual Currencies*, publically available at <https://www.fincen.gov/resources/statutes-regulations/guidance/application-fincens-regulations-persons-administering>.


7. Attached hereto as **Exhibit E** is a true and correct copy of an email chain dated May 26, 2014, Bates numbered RPLI_SEC 0057498.

8. Attached hereto as **Exhibit F** is a true and correct copy of an email chain dated February 6, 2017 to June 30, 2019, Bates numbered RPLI_SEC 0234183–87.

9. Attached hereto as **Exhibit G** is a true and correct copy of an email dated June 4, 2017, and attachments, Bates numbered RPLI_SEC 0026793–95.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2021
New York, New York



Jorge G. Tenreiro